

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,)	
)	
PLAINTIFF,)	
)	
v.)	CIVIL ACTION: 23-cv-00086
)	
LM WIND POWER BLADES, INC.,)	
)	
DEFENDANT.)	
)	

JOINT MOTION TO STAY DISCOVERY

Plaintiff, Equal Employment Opportunity Commission (“EEOC” or “Plaintiff”), and Defendant, LM Wind Power Blades, Inc. (“Defendant”), by and through their undersigned counsel, jointly move this Court to stay the current fact discovery deadline of August 30, 2024, for 14 days. In support thereof, the parties state as follows:

1. The current fact discovery deadline of August 30, 2024, was set by the Court on September 28, 2023. Dkt. No. 12.
2. The EEOC and Defendant have been reengaged in settlement negotiations since at least June 5, 2024, when EEOC sent Defendant the draft consent decree.
3. After additional follow up, Defendant sent a redline of the decree to the EEOC on July 26, 2024, with the caveat that it still needed to finalize the review.
4. Defendant sent a finalized draft of its redline of the decree to EEOC on August 2, 2024.
5. EEOC responded to Defendant’s edits on August 27, 2024, indicating they would accept most of Defendant’s changes with the exception of two issues.

6. The parties respectfully request a stay in discovery for 14 days while the parties finalize settlement.

7. While hopeful that it is unnecessary, and if the Court agrees, the parties will submit a new joint amended discovery schedule on September 16, 2024, if settlement negotiations prove unsuccessful.

WHEREFORE, the parties request this Court enter an Order staying discovery.

Dated August 28, 2024

Respectfully submitted,

/s/ Kelly Bunch

Kelly Bunch

Chicago District Office

230 S. Dearborn St., Suite 2920

Chicago, Illinois 60604 Telephone:

312) 872-9704

Email: kelly.bunch@eeoc.gov

Greger Calhan

Minneapolis Area Office

330 Second Ave South, Suite 720

Minneapolis, Minnesota 55401

Telephone: (612) 552-7323 Email:

greger.calhan@eeoc.gov

**Attorneys for Plaintiff Equal
Employment Opportunity
Commission**

**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P. C.**

/s/ Brent. D. Kettelkamp Brent
D. Kettelkamp, ND #09600 Capella
Tower

225 South Sixth Street, Suite 1800

Minneapolis, MN 55402

Telephone: 612-339-1818

Facsimile: 612-339-0061

brent.kettelkamp@ogletree.com

**Attorney for Defendant LM Wind
Power Blades, Inc.**